

Hearing Date: October 15, 2009 at 2:00 p.m. (prevailing Eastern Time)
Objection Deadline: October 9, 2009 at 4:00 p.m. (prevailing Eastern Time)

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Attorneys for James W. Giddens, as
Trustee for the SIPA Liquidation of Lehman Brothers Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

In re

LEHMAN BROTHERS INC.,

Debtor.

Case No. 08-01420 (JMP) SIPA

**THE TRUSTEE'S JOINDER IN MOTION OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF LEHMAN BROTHERS HOLDINGS INC., *ET AL.*,
PURSUANT TO 11 U.S.C. §§ 105(a) AND 107(a), TO UNSEAL MOTIONS FOR RELIEF
FROM SEPTEMBER 20, 2008 SALE ORDER (AND RELATED SIPA SALE ORDER)**

James W. Giddens (the "Trustee"), as Trustee for the SIPA Liquidation of Lehman
Brothers Inc., by his undersigned counsel, hereby joins in the motion (the "Motion") filed by The

Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al. (the “Committee”), pursuant to sections 105(a) and 107(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), for the entry of an order unsealing (with limited exceptions relating to compensation information) the filed -- yet redacted -- versions of the

- (i) Motion Of Official Committee Of Unsecured Creditors Of Lehman Brothers Holdings Inc., et al., Pursuant To 11 U.S.C. § 105(a), Fed. R. Civ. P. 60(b), And Fed. R. Bankr. P. 9024, For Relief From Order Under 11 U.S.C. §§ 105(a), 363, And 365 And Federal Rules Of Bankruptcy Procedure 2002, 6004 And 6006 Authorizing And Approving (A) Sale Of Purchased Assets Free And Clear Of Liens And Other Interests And (B) Assumption And Assignment Of Executory Contracts And Unexpired Leases, Dated September 20, 2008 (And Related SIPA Sale Order) And Joinder In Debtors’ And SIPA Trustee’s Motions For An Order Under Rule 60(b) To Modify Sale Order (the “Committee Motion”),
- (ii) Debtors’ Motion For An Order, Pursuant To Fed. R. Civ. P. 60 And Fed. R. Bankr. P. 9024, Modifying September 20, 2008 Sale Order And Granting Other Relief, dated September 15, 2009 (the “LBHI Motion”), and
- (iii) Trustee’s Motion For Relief Pursuant To The Sale Orders Or, Alternatively, For Certain Limited Relief Under Rule 60(b), dated September 15, 2009 (the “Trustee’s Motion”) and the accompanying Declarations of William R. Maguire and James B. Kobak, Jr. in Support of the Trustee’s Motion.

The Trustee supports the relief requested in the Motion and respectfully requests, for the reasons provided in the Motion, and in particular because the Trustee’s Motion contains no confidential information, such as lists or valuations of securities, that is entitled to protection under section 107(a) of the Bankruptcy Code, that the Court enter an order (substantially in the form set forth in the proposed order attached to the Motion) authorizing (i) the Committee to file a substantially unredacted form of the Committee Motion, (ii) authorizing LBHI to file a substantially unredacted form of the LBHI Motion, (iii) authorizing the Trustee to file a substantially unredacted form of the Trustee’s Motion and the declarations in support thereto,

and (iv) and providing the Trustee such other and further relief as the Court may deem just,
proper and equitable.

Dated: New York, New York
September 24, 2009

HUGHES HUBBARD & REED LLP

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